

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

KIMBERLY HOUSTON,

Plaintiff,

v.

Case No. 2:21-cv-02393-SHM-cgc

MEMPHIS LIGHT GAS AND WATER
DIVISION,

Defendant.

VERDICT FORM

We, the duly empaneled and sworn jury, after careful consideration and deliberation, unanimously find as follows:

- 1) Do you find by a preponderance of the evidence that Memphis Light Gas and Water Division ("MLGW") was the joint employer of Plaintiff Kimberly Houston?

Yes X

No _____

- 2) Do you find by a preponderance of the evidence that Memphis Light Gas and Water Division ("MLGW") was the joint employer of William "Rick" Thompson?

Yes X

No _____

If you answered "No" to question number 1 or 2, you should now stop your deliberations, sign the verdict form at the bottom of page 2, and return to the courtroom to render your verdict.

If you answered "Yes" to each question above, you must determine whether Plaintiff has satisfied the elements of her Title VII claim.

3) Do you find by a preponderance of the evidence that:

- a. Plaintiff Kimberly Houston belonged to a protected group;
- b. She was subject to unwelcome harassment;
- c. The harassment was based on sex;
- d. The harassment was sufficiently severe or pervasive to alter the conditions of employment and create a hostile working environment; and
- e. The Defendant knew or should have known about the harassment and failed to take appropriate corrective action to end the harassment.

Yes _____ No X

If you answered "No" to question number 3, stop your deliberations, sign the verdict form, and return to the courtroom to render your verdict.

If you answered "Yes" to question number 3, you must determine whether Plaintiff Kimberly Houston has suffered any compensatory damages.

4) Do you find by a preponderance of the evidence that Plaintiff Kimberly Houston has suffered any compensatory damages as a result of MLGW's conduct (or lack thereof)?

Yes _____ No _____

If you answered "No" to question number 4, stop your deliberations, sign the verdict form, and return to the courtroom to render your verdict.

If you answered "Yes" to question number 4, enter the appropriate amount of compensatory damages to which Plaintiff is entitled, sign the verdict form, and return to the courtroom to render your verdict.

Compensatory Damages: \$ _____

12/12/2024
DATE

[Signature]
FOREPERSON